

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FORT SMITH DIVISION

UNITED STATES OF AMERICA,)
Plaintiff)
)
v.) No. 2:19-cv-02084-PKH
)
HEATHER ELIZABETH MASHBURN,)
Defendant)

COMPLAINT

Comes now the United States of America, and for its cause of action against the Defendant, Heather Elizabeth Mashburn, states:

1. This is an action brought pursuant to the Federal Debt Collection Procedures Act, 28 U.S.C. § 3001 et. seq., and the Court has jurisdiction of this action pursuant to 28 U.S.C. § 1345.
2. Venue is proper in the Western District of Arkansas pursuant to 31 U.S.C. § 3732(a), 28 U.S.C. § 1391(b), and 28 U.S.C. § 1395(a).
3. The Defendant resides in Sebastian County within the Western District of Arkansas.
4. The Defendant did knowingly convert to her own use, \$13,564.80 belonging to the Social Security Administration, an agency of the United States of America.

WHEREFORE, Plaintiff, United States of America, prays for judgment in personam against the Defendant, Heather Elizabeth Mashburn, for the principal amount of \$13,564.80 and that the Plaintiff have such other proper relief to which it is entitled.

DUANE DAK KEES
UNITED STATES ATTORNEY

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